

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JILL BLOOMBERG,

Plaintiff,

v.

THE NEW YORK CITY DEPARTMENT OF  
EDUCATION and CARMEN FARINA,

Defendants.

-----x  
AFFIRMATION OF  
MARIA L. CHICKEDANTZ  
IN FURTHER SUPPORT OF  
PLAINTIFF'S MOTION  
FOR PRELIMINARY  
INJUNCTION

MARIA L. CHICKEDANTZ affirms that the following is true and correct under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am the attorney representing plaintiff in the above-captioned matter.
2. I respectfully submit this Affirmation in Further Support of Plaintiff's Preliminary Injunction.
3. On May 1, 2017, this Court held a hearing and heard argument from the parties on the instant motion in Courtroom 705 at 40 Foley Square, and several members of the public attended in support of plaintiff. These supporters included plaintiff's family members, PSC students' parents, PSC staff members, former and current PSC students, concerned members of the community and members of the press.
4. After the hearing, I encountered several PSC staff members who approached me to offer information relevant to plaintiff's case. I therefore requested that they each provide affidavits in support of plaintiff. However, each of them advised me that they wanted to support plaintiff, but were too afraid to openly support her for fear of retaliation by the DOE.

5. The first staff member (“Staff Member 1”) that I approached advised me of the following: “I support Jill, but I’m fearful to speak up for her because I’m afraid the OSI will come after me. I don’t want anything to do with that. I don’t want my name on any of their lists.”

6. The second staff member (“Staff Member 2”) I approached advised me of the following: “I’m an untenured second year teacher. If I put my name on a document, it’ll be used against me. I would be nervous to sign anything because they could come after me for any reason. I’m especially concerned now that I’ve heard the DOE’s position, and they still haven’t provided any evidence that Jill violated any regulation.” Staff Member 2 also advised me that, “I used to feel comfortable discussing civil rights matters at school, but now that the OSI investigation has started, I wouldn’t even wear a Black Lives Matter shirt, since it could lead to my discipline for the same reasons Jill’s in trouble.”

7. The third staff member (“Staff Member 3”) I spoke with advised me of the following: “I’m not comfortable publicly supporting Jill because I would not want anyone at the DOE to have my name. I do not want to be caught up in the OSI investigation.”

8. The fourth staff member (“Staff Member 4”) advised me: “If I knew that I could support Jill in her lawsuit without any risk of retaliation by the DOE, I would do it. But based on what’s going on now against Jill, and the DOE’s reasons for going after her, I’m too afraid of being targeted by OSI, especially because I’m only probationary.” Staff Member 4 also advised me that “It’s obvious that the DOE is going after Jill for speaking out about racism. And it’s now obvious that we aren’t allowed to talk about that at school, or anything related to social justice, like openly supporting immigrant or refugee rights.”

9. The fifth staff member (“Staff Member 5”) advised me that “I am hesitant to put my name out there in support of Principal Bloomberg because I am really nervous about being

the next person OSI decides to investigate.” Staff Member 5 also advised me that “I’m teaching a lesson about the Cold War, and I have to discuss topics such as Communism, which makes me really nervous because of what’s happening to Principal Bloomberg. So I hide my teaching materials every day because I’m afraid someone will turn me in to OSI.”

Dated: New York, New York  
May 1, 2017



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Maria L. Chickedantz